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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **UNITED STATES OF AMERICA**
11 *ex rel.* **IONM LLC**, a Delaware
12 corporation and *ex rel.* **JUSTIN**
13 **CHEONGSIATMOY, M.D.; STATE**
14 **OF CALIFORNIA** *ex rel.* **IONM**
15 **LLC**, a Delaware corporation and *ex*
16 *rel.* **JUSTIN CHEONGSIATMOY,**
17 **M.D.; LOS ANGELES COUNTY** *ex*
18 *rel.* **IONM LLC**, a Delaware
19 corporation and *ex rel.* **JUSTIN**
20 **CHEONGSIATMOY, M.D.; and**
21 **JUSTIN CHEONGSIATMOY,**
22 **M.D.**, in his individual capacity,

23 Plaintiffs,

24 v.

25 **UNIVERSITY OF SOUTHERN**
26 **CALIFORNIA**, a California
27 corporation,

28 and

USC CARE MEDICAL GROUP,
INC., a California corporation,

Defendants.

Case No. 2:18-cv-08311-WLH (AS)

**AMENDED NOTICE OF
REQUEST TO EMAIL
ATTORNEY CHANG BY
FEBRUARY 2, 2024 WITH ALL
TRUE AND CORRECT CASE
CORRESPONDENCE WITH
THE COURT FOR WHICH
ATTORNEY CHANG WAS NOT
INCLUDED**

PLEASE TAKE NOTICE of this request to email Attorney Chang by February 2, 2024 with all true and correct case correspondence with the Court for which Attorney Chang was not included. See Attorney Chang's July 4, 2023 request for all correspondence with Judge Sagar to include Defendants' unilateral submission of the "Stipulated" Protective Order to Judge Sagar's chambers, which Judge Sagar granted

1 at Dkt. 180, despite the fact that Defendants' unilateral submission of the "Stipulated"
2 Protective Order violated both Central District of California Court's Local Rules and
3 Judge Sagar's own rules. See also Dkt. 239 at Pages 18-20 and 25.

4 Defendants still have not complied with Attorney Chang's January 21, 2024
5 written request to email Attorney Chang with all ex parte communications Defendants
6 made in this case and to email Attorney Chang with all records all individuals and/or
7 parties who signed Exhibit A of the Protective Order, agreeing to be bound by the
8 terms. See Dkt. 280 at Pages 6-7. Paul Hastings is and was Defendants' counsel of
9 record including on the dates referenced above. An example referencing Paul Hasting
10 law firm's ex parte communications with the Court is attached hereto as **Exhibit A**.

11 All parties served with this NOTICE either via the Central District of California
12 Court Notice of Electronic Filing and/or served via email (see Proof of Service linked
13 to this Notice) should hereby take notice of this request to email Attorney Chang by
14 February 2, 2024 with all true and correct case correspondence with the Court for
15 which Attorney Chang was not included.

16 Dated: February 1, 2024

17 /s/ Alice Chang
18 Alice Chang, Attorneys for Plaintiff-Relators
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Exhibit A

From: **Bailey, Rebekah** <bailey@nka.com>

Date: Fri, May 20, 2022 at 11:07 AM

Subject: Redaction Needed in Today's Filing

To: Jonathan Radke <jradke@nelsonhardiman.com>, Mark Hardiman <mhardiman@nelsonhardiman.com>, Mary Markwell <mmarkwell@nelsonhardiman.com>, paulcane@paulhastings.com <paulcane@paulhastings.com>, alicebrown@paulhastings.com <alicebrown@paulhastings.com>

Cc: Kornblit, Michelle <mkornblit@nka.com>, Nelson, Kristine <knelson@nka.com>, Alice Chang JDMBA <alicechangjdmdba@gmail.com>, Morgan, Matt <morgan@nka.com>, aashish@desai-law.com <aashish@desai-law.com>

Counsel,

It appears Defendants have filed documents containing Plaintiff's social security number. Please contact the clerk of the court and address this today.

Thank you,

Rebekah

From: **Cane, Paul** <paulcane@paulhastings.com>

Date: Fri, May 20, 2022 at 11:14 AM

Subject: Re: Redaction Needed in Today's Filing

To: Bailey, Rebekah <bailey@nka.com>

Cc: Jonathan Radke <jradke@nelsonhardiman.com>, Mark Hardiman <mhardiman@nelsonhardiman.com>, Mary Markwell <mmarkwell@nelsonhardiman.com>, Brown, Alice <alicebrown@paulhastings.com>, Kornblit, Michelle <mkornblit@nka.com>, Nelson, Kristine <knelson@nka.com>, Alice Chang JDMBA <alicechangjdmdba@gmail.com>, Morgan, Matt <morgan@nka.com>, aashish@desai-law.com <aashish@desai-law.com>

We are contacting the clerk to see if we can file a redacted version. Sorry, that was inadvertent. Is there anything else there that you regard as confidential?

Paul

From: **Bailey, Rebekah** <bailey@nka.com>

Date: Fri, May 20, 2022 at 12:10 PM

Subject: RE: Redaction Needed in Today's Filing

To: Cane, Paul <paulcane@paulhastings.com>

Cc: Jonathan Radke <jradke@nelsonhardiman.com>, Mark Hardiman <mhardiman@nelsonhardiman.com>, Mary Markwell <mmarkwell@nelsonhardiman.com>, Brown, Alice <alicebrown@paulhastings.com>, Kornblit, Michelle <mkornblit@nka.com>, Nelson, Kristine <knelson@nka.com>, Alice Chang JDMBA <alicechangjdmdba@gmail.com>, Morgan, Matt <morgan@nka.com>, aashish@desai-law.com <aashish@desai-law.com>

Thank you Paul. It appears you also filed his passport number, home address, birthday, and driver's license in violation of the ECF filing certification. Refer to Rule 5.2 and L.R. 5.2-1 for rules on redacting this information.